#### UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JOSEPH ABBOUD MANUFACTURING

v.

Dr 23-4-1 31# 818189

**CORP.**, on behalf of itself and all others similarly situated,

Plaintiff,

WILLIAM PRYM GMBH & CO., KG; PRYM CONSUMER USA, INC.; PRYM FASHION, INC.; COATS PLC; COATS NORTH AMERICA DE REPUBLICA DOMINICANA, INC.; YKK CORPORATION; YKK CORPORATION OF AMERICA, INC.; YKK (U.S.A.) INC.; YKK SNAP FASTENERS AMERICA, INC.; and SCOVILL **FASTENERS, INC.** 

Defendants.

Civil Action No. 07-cv-10641(DC)

**MOTION TO ADMIT** COUNSEL PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I Linda P. Nussbaum, a member in good standing of the Bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

> Eric L. Cramer Berger & Montague, P.C. 1622 Locust Street Philadelphia, PA 19103 Phone: (215) 875-3000 Fax: (215) 875-4604

Eric L. Cramer is a member in good standing of the Bar of the State of New York and the Commonwealth of Pennsylvania.

There are no pending disciplinary proceedings against Eric L. Cramer in any State or Federal court.

Dated: January 3, 2008

New York, New York

Respectfully Submitted,

Linda P. Nussbaum (LN-9336)

KAPLAN, FOX & KILSHEIMER, LLP

850 Third Avenue, 14<sup>th</sup> Floor

New York, NY 10022 Phone: (212) 687-1980

Fax: (212) 687-7714

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IUCEDH	ARROUD	MANUEA	CTURING
JUSEPH	ABBUILL	IVIAINULA	KIINUT

**CORP.**, on behalf of itself and all others similarly situated,

Plaintiff,

v.

WILLIAM PRYM GMBH & CO., KG; PRYM CONSUMER USA, INC.; PRYM FASHION, INC.; COATS PLC; COATS NORTH AMERICA DE REPUBLICA DOMINICANA, INC.; YKK CORPORATION; YKK CORPORATION OF AMERICA, INC.; YKK (U.S.A.) INC.; YKK SNAP FASTENERS AMERICA, INC.; and SCOVILL FASTENERS, INC.

Defendants.

AFFIDAVIT OF LINDA P.

NUSSBAUM IN SUPPORT OF

**MOTION TO ADMIT** 

**COUNSEL PRO HAC VICE** 

Civil Action No. 07-cv-10641(DC)

State of New York ) ss County of New York )

Linda P. Nussbaum, being duly sworn, hereby deposes and says as follows:

- 1. I am a Partner at Kaplan, Fox & Kilsheimer, LLP, Counsel for Plaintiff in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Eric L. Cramer as counsel pro hac vice to represent Plaintiff in this matter.
- 2. I am a member in good standing of the bar of the State of New York, and was admitted to Practice law on March 15, 1978. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
- 3. I have known Eric Cramer since 2002.
- 4. Mr. Cramer is a member of the Firm of Berger & Montague, P.C. in Philadelphia, PA.
- 5. I have found Mr. Cramer to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

- Accordingly, I am pleased to move the admission of Mr. Cramer, pro hac vice. 6.
- 7. I respectfully submit a proposed order granting the admission of Eric L. Cramer, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit Eric L. Cramer, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Dated: January 3, 2008 New York, NY

Respectfully submitted,

Linda P. Nussbaum (LPN 9336)

TIREK J. GAYLE
Notary Public, State of New York
No. 01GA6066847 Qualified in Bronx County Commission Expires Nov. 26, 2009



### Supreme Court of Pennsylvania

### **CERTIFICATE OF GOOD STANDING**

Eric L. Cramer, Esq.

#### **DATE OF ADMISSION**

December 1, 1993

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal Dated: December 19, 2007

Patricia A Johnson Chief Clerk

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

#### JOSEPH ABBOUD MANUFACTURING

**CORP.**, on behalf of itself and all others similarly situated.

Plaintiff,

VS.

Civil Action No. 07-cv-10641(DC)

WILLIAM PRYM GMBH & CO., KG; PRYM CONSUMER USA, INC.; PRYM FASHION, INC.; COATS PLC; COATS NORTH AMERICA DE REPUBLICA DOMINICANA, INC.; YKK CORPORATION; YKK CORPORATION OF AMERICA, INC.; YKK (U.S.A.) INC.; YKK SNAP FASTENERS AMERICA, INC.; and SCOVILL FASTENERS, INC.

Defendants.

ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

Upon the motion of Linda P. Nussbaum for Joseph Abboud Manufacturing Corp. and said sponsor attorney's affidavit in support,

#### IT IS HEREBY ORDERED THAT:

Eric L. Cramer Berger & Montague, P.C. 1622 Locust Street Philadelphia, PA 19103 Phone: (215) 875-3000

Fax: (215) 875-4604

Is admitted to practice pro hac vice as counsel for Joseph Abboud Manufacturing Corp. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at <a href="mailto:nysd.uscourts.gov">nysd.uscourts.gov</a>. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:	
	Judge Denny Chin

#### AFFIDAVIT OF SERVICE

The undersigned hereby certifies that on the 3<sup>rd</sup> day of January, 2008, true and correct copies of the annexed Motion to Admit Counsel Pro Hac Vice along with all supporting documents was served via First Class U.S. Mail on the following:

Joseph F. Wayland Simpson Thacher & Bartlett LLP 425 Lexington Avenue New York, NY 10017-3954

Wayland Direct Dial Telephone: (212) 455-3203

Telephone: (212) 455-2000 Fax: (212) 455-2502

E mail: jwayland@stblaw.com

Steven A. Reiss Scott Martin Christopher V. Roberts Weil, Gotshal & Manges LLP 767 Fifth Avenue New York, NY 10153

Reiss Direct Dial Telephone: (212) 310-8174 Martin Direct Dial Telephone: (212) 310-8481 Roberts Direct Dial Telephone: (212) 310-8549

Main Telephone: (212) 310-8000

Fax: (212) 310-8007

E mail: steven.reiss@weil.com scott.martin@weil.com christopher.roberts@weil.com

Laura B. Woodson Smith, Gambrell & Russell, LLP 1230 Peachtree Street, N.E. Atlanta, GA 30309-3592

Woodson Direct Dial Telephone: (404) 815-3624

Telephone: (404) 815-3500

Fax: (404) 685-6924

E mail: lwoodson@sgrlaw.com

John Shin Morgan Lewis & Brockius LLP 101 Park Street New York, NY 10178-0060 Shin Direct Dial Telephone: (212) 309-6844

Main Telephone: (212) 309-6000

Fax: (212) 309-6001

E mail: jshin@morganlewis.com

Peter E. Halle J. Clayton Everett, Jr. Morgan Lewis & Brockius LLP 1111 Pennsylvania Avenue, NW Washington, DC 20004 Halle Direct Dial Telephone: (202) 739-5225 Everett Direct Dial Telephone: (202) 739-5860

Main Telephone: (202) 739-3000

Fax: (202) 739-3001

E mail: phalle@morganlewis.com

jeverett@morganlewis.com